

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

William Soler Justice, *
*
Plaintiff, *
v. * Civil No. 1:20-cv-00517-PB
*
Christopher T. Sununu, et al., *
*
Defendants. *

DEFENDANTS' ASSENTED-TO MOTION TO SET DEADLINES

Defendants, by and through counsel, the New Hampshire Office of the Attorney General, hereby submits the following Motion to Set Deadlines, stating as follows:

1. The Court continued the Status Conference on May 14, 2025 for Plaintiff's guardian to attend, and instructed the parties to confer regarding deadlines prior to the next Status Conference. Defendants conferred by email with Plaintiff and his guardian regarding proposed deadlines on May 28, 2025, and Plaintiff and his guardian confirmed that they agree with the proposed deadlines, as follows:

- Deadline to serve additional discovery requests (limited to newly-added defendants)– 7/1/2025
- Deadline to depose Plaintiff – 7/30/2025¹
- Plaintiff's expert disclosure – 7/15/2025
- Defendants' expert disclosure – 9/1/2025
- Expert deposition completion deadline– 10/1/2025

¹ The parties have tentatively agreed to schedule the deposition for July 9, 2025, but the parties have not agreed on a location. The Defendants are proposing to host the deposition in a conference room at the NH DOJ office in Concord or remotely. Plaintiff has indicated that he does not agree to be deposed at the NH DOJ office but has not proposed an alternative location.

- Motion for Summary Judgment deadline – 11/3/2025
- Objection to MSJ – 12/3/2025
- Reply to Objection to MSJ – 12/17/2026

WHEREFORE, Defendants respectfully request that this Court grant this Motion and set the foregoing deadlines in this matter.

Respectfully submitted,

THE OFFICE OF THE ATTORNEY GENERAL

Dated: June 3, 2025

/s/ Catherine A. Denny

Catherine A. Denny, Bar #275344

Assistant Attorney General

Civil Bureau

NH Department of Justice

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed to Plaintiff at 51 Storrs St., #310, Concord, NH 03301 on this same date.

Dated: June 3, 2025

/s/ Catherine Denny

Catherine A. Denny